

 ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

KALOMA CARDWELL,

Plaintiff,

-against-

DAVIS POLK & WARDWELL LLP, *et al.*,

Defendants.

-----X

USDC SDNY  
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1:19-cv-10256-GHW

**VERDICT SHEET**

Please indicate each of your verdicts with a check mark (✓).

All jurors must agree on the answers to all of the questions.

Answer the following questions in order. Follow the instructions at the end of each question.

**Retaliation—Section 1981 and New York State Human Rights Law**

1. Has Mr. Cardwell proved, by a preponderance of the evidence, that Davis Polk & Wardwell LLP is liable for retaliation under Section 1981 and the New York State Human Rights Law?

Yes \_\_\_\_\_

No ☒ \_\_\_\_\_

*Continue on to Question 2.*

2. Has Mr. Cardwell proved, by a preponderance of the evidence, that Thomas Reid is liable for retaliation under Section 1981 and the New York State Human Rights Law?

Yes \_\_\_\_\_

No ☒ \_\_\_\_\_

*Continue on to Question 3.*

3. Has Mr. Cardwell proved, by a preponderance of the evidence, that John Bick is liable for retaliation under Section 1981 and the New York State Human Rights Law?

Yes \_\_\_\_\_

No ☒ \_\_\_\_\_

*Continue on to Question 4.*

**Retaliation—Title VII**

4. Has Mr. Cardwell proved, by a preponderance of the evidence, that Davis Polk & Wardwell LLP is liable for retaliation under Title VII of the Civil Rights Act of 1964?

Yes \_\_\_\_\_

No ☒ \_\_\_\_\_

*If you answered "Yes" to Question 1, you must answer "Yes" to Question 4. If you answered "No" to Question 1, you must also answer "No" to Question 4.*

*Continue on to Question 5.*

**Retaliation—New York City Human Rights Law**

5. Has Mr. Cardwell proved, by a preponderance of the evidence, that Davis Polk & Wardwell LLP is liable for retaliation under the New York City Human Rights Law?

Yes \_\_\_\_\_

No ✓

*Continue on to Question 6.*

6. Has Mr. Cardwell proved, by a preponderance of the evidence, that Thomas Reid is liable for retaliation under the New York City Human Rights Law?

Yes \_\_\_\_\_

No ✓

*Continue on to Question 7.*

7. Has Mr. Cardwell proved, by a preponderance of the evidence, that John Bick is liable for retaliation under the New York City Human Rights Law?

Yes \_\_\_\_\_

No ✓

*Continue on to Question 8.*

*If you answered "Yes" to any of Questions 1 to 7, please continue on to Question 8. If you answered "No" to all of the above questions, you have reached a verdict and need not respond to any other question in this verdict sheet. Please proceed to the last page of the verdict form.*

**Damages—Compensatory or Nominal Damages**

8. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to compensatory or nominal damages from Davis Polk & Wardwell LLP?

Yes \_\_\_\_\_ No ☒

*You may answer "Yes" to Question 8 only if you answered "Yes" to Questions 1, 4, or 5. If you answered "No" to all three questions, you must answer "No" to Question 8.*

- a. If "Yes," in what amount?

\$ \_\_\_\_\_

*Continue on to Question 9.*

9. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to compensatory or nominal damages from Thomas Reid?

Yes \_\_\_\_\_ No ☒

*You may answer "Yes" to Question 9 only if you answered "Yes" to Questions 2 or 6. If you answered "No" to both questions, you must answer "No" to Question 9.*

- a. If "Yes," in what amount?

\$ \_\_\_\_\_

*Continue on to Question 10.*

10. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to compensatory or nominal damages from John Bick?

Yes \_\_\_\_\_ No ☒

*You may answer "Yes" to Question 10 only if you answered "Yes" to Questions 3 or 7. If you answered "No" to both questions, you must answer "No" to Question 10.*

- a. If "Yes," in what amount?

\$ \_\_\_\_\_

*Continue on to Question 11.*

**Damages—Punitive Damages**

11. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to punitive damages from Davis Polk & Wardwell LLP?

Yes \_\_\_\_\_ No ✓

*You may answer "Yes" to Question 11 only if you answered "Yes" to Questions 1, 4, or 5. If you answered "No" to all three questions, you must answer "No" to Question 11.*

*Continue on to Question 12.*

12. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to punitive damages from Thomas Reid?

Yes \_\_\_\_\_ No ✓

*You may answer "Yes" to Question 12 only if you answered "Yes" to Questions 2 or 6. If you answered "No" to both questions, you must answer "No" to Question 12.*

*Continue on to Question 13.*

13. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to punitive damages from John Bick?

Yes \_\_\_\_\_ No ✓

*You may answer "Yes" to Question 13 only if you answered "Yes" to Questions 3 or 7. If you answered "No" to both questions, you must answer "No" to Question 13.*

*Please proceed to the next page.*

*After the Jury has reached unanimous agreement on all the questions and completed the form, the foreperson should date and sign the verdict form, place it in a sealed envelope marked "Verdict," and hand it to the marshal.*

[REDACTED]

Dated: 1/29/24

Signature of Foreperson